

MOD049975998

27.080 Wagnor Electric/LCRA

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JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

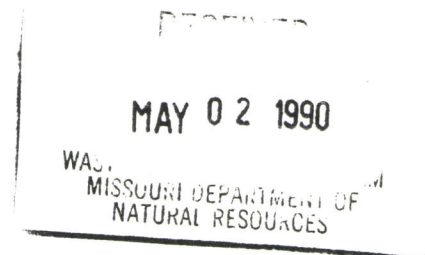
Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

April 27, 1990

Mr. Mark Tranel
Director of Development
St. Louis County Economic Council
Wagnor Electric/LCRA
6510 Page Boulevard
St. Louis, MO 63133



Dear Mr. Tranel:

On April 9, 1990, a Resource Conservation and Recovery and Missouri Hazardous Waste Management Compliance Evaluation Inspection was conducted at Wagoner Electric/LCRA, 6400 Plymouth Avenue, St. Louis, MO 63133. The inspection was conducted by Mr. Mike Struckhoff, Environmental Specialist, Missouri Department of Natural Resources, (MDNR), St. Louis Regional Office, (SLRO). The inspection consisted of a meeting at, and tour of the facility with Mr. Donald Kirchgessner of your office.

The inspection was conducted under authority of the Resource Conservation and Recovery Act of 1976 and Section 260.377 and 260.375(a) of the Missouri Hazardous Waste Management Law (1977) as amended.

No violations were observed during the inspection and no response is required from you.

Because the facility has been out of operation since 1982 and no longer generates hazardous waste. I will inform the MDNR, Waste Management Program, to take Wagnor Electric/LCRA off the active hazardous waste generator list.

If you have any questions, please contact Mr. Struckhoff at (314) 849-1313.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S.P. Eck
Regional Administrator

RSPE:mc

CC: CO-WMP



SMALL QUANTITY GENERATOR

Form SQG-INSP
(9-19-89)
Page 1 of 3

INSPECTION RECORD AND CHECKLIST

Name of Facility WAGONER ELECTRIC / LCRA Date 4-9-90
Address 6400 PLYMOUTH AVE ID #'s MOD049975998
ST LOUIS MO Phone # 889-7663
Facility Representative MARK TRANKL Title DIR. OF DEVELOPMENT
DONALD KIRCHGESSNER ASS. DIR. OF DEVELOPMENT
No. of employees 0 No. of years at this location _____

Provide a brief description of the facility's operations and plant, including the size and content of any tanks:

FACILITY IS NOT IN OPERATION, CLOSED IN 1962
EPA REGION VII HAS ~~BEEN~~ SUPERVISED A HAZARDOUS WASTE
CLEAN-UP OF SITE. THIS CLEAN-UP IS COMPLETED.
THIS WAS CONFIRMED IN A 4-26-90 PHONE CALL TO EPA
REGION VII BY MIKE STRUCKHOFF

List the waste generated: N/A

	Waste	lb or kg/mo.	Waste ID	Disposition
1)	<u>NO WASTE GENERATED</u>	_____	_____	_____
2)	_____	_____	_____	_____
3)	_____	_____	_____	_____
4)	_____	_____	_____	_____
5)	_____	_____	_____	_____
6)	_____	_____	_____	_____

SQG TANKS (Walk-Through, only) N/A

COMMENTS:

- () Uncovered tanks have 2 ft. freeboard unless containment system is in place that holds an equal volume as the freeboard 265.201(b)(3)
- () Continuously fed tanks equipped with a feed cut-off system or a by pass system 265.201(b)(4)
- () Waste and/or treatment method is compatible with tank 265.201(b)(2)
- () Ignitable or reactive wastes rendered safe/handled properly-265.201(e)(1)/(f)
- () Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements-265.201(e)(2)
- () Volatiles with vapor pressure >760 mm Hg @ 25 °C not placed in open tanks-5.262(2)(C)2, D₁
- () Inspection of discharge control equipment/monitoring data/freeboard/leaks/corrosion/etc. each operating day-265.201(c)(1)/2/3/4
- () Weekly inspection of confinement structure, construction materials, and general area-265.201(c)5
- () Wastes and residues removed, including equipment, and handled properly upon closure-265.201(d)

SMALL QUANTITY GENERATOR CHECKLIST

RECORDS INSPECTION

COMMENTS:

GENERAL

- () Registered as a HW Generator-260.380(1)(1) RSMo
- () Utilizes authorized HW TSD, or RR facility-260.380(1)(7) RSMo
- () Facility does not operate as an TSD-260.390(1) RSMo
- () Facility determines if waste = hazardous - 262.11

WASTE OIL 10 CFR 25-11.010

- () Registered as waste oil generator if gen./accum. 220 lb/mo-11.010(2)(A)
- () Written waste oil contract maintained-11.010(4)(A)
- () Waste oil properly stored, transported and disposed of-11.010(1)(D)
- () RR cert. for energy recovery or reclamation on-site-9.010

MANIFESTS 10 CFR 25-5.262(2)(B) & 40 CFR 262.20

- () Facility uses manifest system-260.380 RSMo, 5.262(2)(B)
- () Records maintained for a 3 year period-262.40(a)
- () Generator's MO and EPA I.D. Numbers-5.262(2)(B), 262.12
- () Manifest filled out in accordance with instructions - 262.20, 5.262(2)(B)1
- () Manifest document, ID, & consecutive shipment numbers - 5.262(2)(B)2,A
- () Generator's name, address, phone # - 262.20
- () All transporter's names, phone #, MO and EPA I.D. #'s 5.262(2)(B)2, 262.20
- () Designated facility name, address, phone, MO and EPA I.D. #, DOT shipping name, Hazard Class and I.D. # (AQ-if required)-262.20/49 CFR 172
- () Containers, Quantity and Unit wt/vol being shipped properly designated-262.20
- () Proper certification - 262.20
- () Manifest properly signed and dated-262.20
- () Out of state manifests have all required MO information 5.262(2)(B)4,A
- () No manifest continuation sheets are used-5.262(2)(B)1
- () Manifest returned within 35 days-5.262(2)(B)6,B or exception generator report submitted within 45 days-5.262(2)(B)2,C; 262.42(b)
- () Completed Manifests sent to DNR QTRLY-5.262(2)(B)6,A
- () Summary Manifest Reports sent to DNR QTRLY-5.262(2)(D)1
- () Waste reclaimed under a contractual agreement (type, frequency, and shipping vehicle ownership)-262.20(e)1
- () Generator maintains a copy of the contractual agreement onsite-262.20(e)2
- () Proper "Land-Ban" notification/certification, (EPA HW #, treatment standards, manifest #, waste analysis data, etc.) sent with manifests and retained on-site. - reference 268.7

PREPAREDNESS AND PREVENTION-265 Subpart C & 262.34(d)

- () Arrangements with local emergency agencies-265.37
- () Emergency coordinator(s) on premise or on call-262.34(d)

WALK-THROUGH INSP

COMMENTS:PRETRANSPORT, CONTAINERIZATION, AND STORAGE-5.262(2)(C)1, 262.34

- N/A
- () Waste packaged/labeled/marked per DOT//during entire on-site storage period-262.307, 317, 327/5.262(2)(C)
 - () Date of accumulation marked on containers-262.34(a)(2)
 - () Placards available for use by transporters-262.33
 - () Storage does not exceed 180 days (270 days if transported >200 miles) or exceed 13,200 lb. in total - 262.34
 - () If any combination of waste is generated or accumulated that = 1000kg, then LQ standards apply-5.262(2)(C)2 (contingency and p.t. plan, containment, etc.), except for storage times. DO LOG chist.
 - () Facility inspected and maintained (weekly)-265.174
 - () Daily inspection of loading/unloading area (when in use) 5.262(2)(C)2.A.(II)
 - () Containers in good condition and inspected-5.262(2)(C)A; 265.171/174
 - () Containers closed tight in storage-265.173(a)
 - () Containers storing incompatible waste separated or protected from each other-265.177
 - () Adequate aisle space is available-265.35
 - () Containers of ignitable or reactive waste stored 50 feet from property line (or have a variance)-265.176
 - () "No Smoking" signs conspicuously placed by ignitable or reactive wastes-5.262(2)(C)2.D.(II)
 - () Containers protected from contact with accumulated liquids 5.262(2)(C)2.B

SATELLITE ACCUMULATION-5.262(2)(C)3 & 262.34(c)

- () Stored in satellite areas less than 1 year
- () Container marked identifying contents and beginning date
- () Containers kept closed/compatible/good condition
- () Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes)
- () Satellite containers go to storage within 3 days of filling - 262.34(c)

PREPAREDNESS & PREVENTION and EMERGENCY PROCEDURES-265 Subpart C, 262.34(d)

- () Emergency coordinator's name and phone number posted near phone-262.34(d)
- () Device in the hazardous waste operation area capable of summoning emergency assistance-265.34, 265.32(a)
- () Adequate and proper spill control, decontamination and safety equipment available (fire blankets, gas masks, SCBA, absorbents, etc) and properly tested and maintained-265.32
- () Adequate water supply for fire control equipment-265.32(d)
- () Communication and emergency equipment tested and maintained 265.33
- () Telephone number of fire department posted near phone-262.34(d)
- () Location of fire extinguisher and spill control equipment posted near phone-262.34(d)
- () Employees familiar with waste handling and emergency procedures 262.34(d)
- () Facility operated and maintained to minimize the possibility of an emergency-5.262(2)(E), 265.31
- () Place a check mark if in compliance, leave blank if not.
- () This is a class 1 violation

INSPECTOR: Mr. StrullDATE: 4-9-90

FACILITY REP.

SIGNATURE: _____

TITLE: _____

27.080 Wagnor Electric/LCRA

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HWG 001500
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RECEIVED

MAY 15 1990

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